

0022

Incoming
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3347
OK

From: "Shaver, Dave" <dshaver@coalsource.com>
To: <Steve_Rigby@blm.gov>
CC: "Hibbs, David" <dhibbs@coalsource.com>, "Canning, Dave" <dcanning@coalso...>
Date: 7/28/2009 8:59 AM
Subject: FW: N10040 @ Centennial

Steve...As you can see from the email below, DOGM is requiring that the Tower GVH drill holes #1 and #5 be reclaimed in order to abate Violation 10040. The reclamation plan specifies that the holes must be plugged according to federal (i.e., BLM) requirements. As you are aware, all these GVH holes are cased for the entire length of the hole, and have been cemented around the outside of the casing for the entire length as well. Under this situation, does BLM require that the entire hole be plugged with concrete, or would it be acceptable to plug the bottom 100' and the top 100' of the hole. Since these are fairly deep holes (2500') it will make a significant difference in how we bid out the job. Please let me know BLM's position so that we can proceed accordingly. Thanks

Dave

From: Pete Hess [mailto:petehess@utah.gov]
Sent: Tuesday, July 28, 2009 7:57 AM
To: Shaver, Dave
Cc: Daron Haddock; Jim Smith; Joe Helfrich
Subject: N10040 @ Centennial

Dave...

I realized this AM that I can not separate remedial actions #1 and #2 which have been completed from #3 which remains as far as the termination of the violation is concerned.

You must reclaim GVH's #1 and #5 (which were identified yesterday as having no future use for venting) in order to have N10040 terminated.

You are ahead of schedule up to this point, but August 20 is 45 days of the maximum of 90 days which is allowed for the remedial action completion.

I know the reclamation of the two wells can be completed by then, assuming the Andalex senior managers allow the funding to do so. FIGURE 5-6 in the Centennial plan states that final reclamation activities /

well can be completed in seven days. So, what is being required is not un-realistic.

If you have any questions, Dave please call. I apologize for improperly telling you I could terminate the first two parts of the violation. I can inform the assessment officer that you have made progress on abatement of the violation, but as I have already said, remedial action #3 remains to be completed.

As you are aware, your MRP requires reclamation of GVH's "upon permanent cessation of gob gas venting" (page 5-11, Section 541.100)